

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Telecommunications Relay Services)	
and Speech-to-Speech Services for)	CG Docket No. 03-123
Individuals with Hearing and Speech)	
Disabilities)	
)	
Petition for Clarification on Spanish VRS)	
By Communication Services for the Deaf)	
)	
_____)	

REPLY COMMENTS OF SPRINT NEXTEL CORPORATION

Sprint Nextel Corporation ("Sprint"), hereby respectfully submits its reply to the comments filed in response the Commission's *Public Notice*, DA 06-387, released February 22, 2006 (21 FCC Rcd 1656) in the above-referenced proceeding. In the *Public Notice*, the Commission has asked for comments on the Petition filed by Communication Service for the Deaf ("CSD") seeking clarification that "providers of ASL-to-Spanish VRS are not required to offer the service 24 hours a day and 7 days a week to be eligible for compensation from the TRS fund." *Public Notice*, 21 FCC Rcd at 1656. Sprint believes that no clarification is needed since as Verizon explains "[t]he Commission rules already establish that there is no such requirement." Verizon Comments at 1. As Verizon points out (Comments at 1-2), although the Commission has determined that the offering of ASL-to-Spanish VRS can be compensated from the TRS Interstate Fund, the Commission did not mandate the service. Thus, as set forth in 47 C.F.R.

§607.604(b)(4) of the Rules, providers of the service need not provide it 24 hours a day every day.¹ *See also* CSD Petition at 2-3.

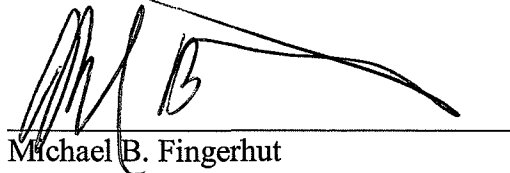
Further evidence, as if more were needed, that the ASL-to-Spanish VRS need not be offered 24 hours a day seven days a week is provided by Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI). In its comments, TDI does not attempt to argue that the Commission required ASL-to-Spanish VRS to be offered 24 hours a day 7 days a week. Rather, it asks the Commission “now find that those providers that offer Spanish-ASL VRS must make it available twenty-four hours a days even days a week.” TDI Comments at 4. To make such a finding, however, the Commission would have to institute a separate rulemaking seeking to amend Section 607.604(b)(4) so as to include this offering in the scope of the VRS exception. And, as TDI acknowledges, such rulemaking would need to examine how providers would be compensated for providing what is a low-volume, but given the lack of CAs capable of translating ASL to Spanish, a high cost service.

¹ Section 607.604(b)(4) does except VRS as a non-mandatory TRS service from the scope of the Rule. However, as Verizon explains that exception applies only to ASL-to English VRS and not to ASL to Spanish VRS. Verizon Comments at 2-3.

In sum, given that the neither the Commission's decision authorizing the payment of compensation from the Interstate TRS Fund to providers of ASL-to Spanish VRS service nor Commission rules do not mandate the offering of the service 24 hours a day, 7 days a week, Sprint believes that CSD's requested clarification is not necessary

Respectfully submitted,

SPRINT NEXTEL CORPORATION

A handwritten signature in black ink, appearing to read 'MB', is written over a horizontal line.

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April 24, 2006

CERTIFICATE OF SERVICE

I, Joyce Y. Walker, hereby certify that I have on this 24th day of April 2006, served via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing reply comments of Sprint Nextel Corporation," In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities CG No. 03-123, filed this date with the Secretary, Federal Communications Commission, to the persons listed below.


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